

REMARKS

Claims 1-9 were examined in the Office Action mailed March 2, 2009, while claims 10-15 stand withdrawn pursuant to an Election/Restriction Requirement.

Claims 1-9 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,311,704 to Foster ("Foster"), in view of U.S. Patent No. 6,609,878 to Ootoshi *et al.* ("Ootoshi").

1. The Pending Claims Are Patentable Over Foster and Ootoshi. The Applicant respectfully traverses the rejection under § 103(a) of claims 1-9 and unpatentable over the Foster and Ootoshi references, on the ground that the references do not disclose or suggest all of the features of the present invention recited in independent claim 1 and its dependent claims 2-9.

Pending claim 1 recites, *inter alia*, that "a gas turbine is introduced, before being disassembled, into a first apparatus which is at least largely sealed against a cleaning agent being emitted therein."

The Foster reference discloses a cleaning apparatus "for injecting cleaning materials into the steam chest of a turbine." Foster Abstract (emphasis added).

Thus, as acknowledged in the pending Office Action, Foster does not teach or suggest an apparatus into which a turbine is placed for cleaning, but instead teaches an apparatus which is *attached to the exterior of a turbine casing*. See, e.g., Foster Abstract, Figs. 1-6; see also March 2, 2009 Office Action at 3 ("Foster

teaches a method of maintenance of gas turbines¹ ... including *attaching* a cleaning apparatus ... *to the gas turbine* ..." (emphasis added)).

The Ootoshi reference does not cure the deficiencies of Foster. Ootoshi teaches an arrangement of supports and lifting equipment for moving the upper outer casing of a turbine throughout a maintenance facility (again, Ootoshi addresses a *steam turbine*; gas turbines do not have the sort of outer steam chest casing being addressed by Ootoshi, and thus Ootoshi's casing support structure is inapposite to the present invention as a threshold matter). Ootoshi simply does not contain or suggest anything with respect to a largely sealed cleaning apparatus into which a gas turbine is placed before disassembly.

Because no combination of the Foster and Ootoshi references teaches or suggests claim 1's method of gas turbine maintenance in which "a gas turbine is introduced, before being disassembled, into a first apparatus which is at least largely sealed against a cleaning agent being emitted therein, the gas turbine is cleaned in the first apparatus and is removed from the first apparatus after having been cleaned and the cleaned gas turbine is then passed on for disassembly," claims 1-9 are patentable over these references under § 103(a).

Accordingly, reconsideration and withdrawal of the pending § 103(a) rejections is respectfully requested.

¹ In fact, as a further ground for distinguishing the present invention, Foster teaches attaching its cleaning apparatus to *steam* turbines, not to *gas* turbines, which are handled, maintained and cleaned in fundamentally different ways than steam turbines.

CONCLUSION

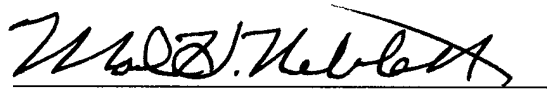
In view of the foregoing remarks, the Applicant respectfully submits that claims 1-9 are in condition for allowance. Early and favorable consideration, and issuance of a Notice of Allowance for these claims, is respectfully requested

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #011235.55725US).

Respectfully submitted,

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